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7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA  
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10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 vs.  
13 DAMON BOSWELL,  
14 Defendant.

Case No.: 2:13-cr-183-JAD-CWH

**UNOPPOSED MOTION AND**  
**~~PROPOSED~~ ORDER TO MODIFY THE**  
**CONDITIONS OF PRETRIAL RELEASE**

15 COMES NOW THE DEFENDANT, DAMON BOSWELL, by and through counsel,  
16 RENE L. VALLADARES, Federal Public Defender, and NISHA BROOKS-WHITTINGTON,  
17 Assistant Federal Public Defender, counsel for Mr. Boswell, and respectfully requests that the  
18 conditions of Mr. Boswell' release be modified to include permission to travel within the  
19 Continental United States.

20 This Stipulation is entered into for the following reasons:

21 1. On October 10, 2013, Mr. Boswell appeared for his initial appearance and  
22 arraignment and plea before the Magistrate Judge Ferenbach. He pleaded not guilty to the charges  
23 alleged in the indictment. Mr. Boswell was released on a personal recognizance bond with pretrial  
24 services supervision. Mr. Boswell's conditions of release restrict his travel between the Central  
25 District of California and Nevada.

26 2. Mr. Boswell is currently employed as an independent business representative  
27 with American Community Network ("ACN"). ACN focuses on marketing services to different  
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1 companies. Mr. Boswell's current employment requires travel for leadership meetings, sales, and  
2 conferences. In fact, ACN is hosting a convention in Charlotte, North Carolina from February 14-16,  
3 2014, that Mr. Boswell would like to attend.

4 3. Mr. Boswell shares a close relationship with his father. His father is  
5 approximately 67 years old and lives in San Diego, California. As a result of Mr. Boswell's travel  
6 restriction, he is unable to visit his father. Mr. Boswell's father is diabetic and suffers from other  
7 health ailments. Mr. Boswell would like to occasionally visit his father and assist him with  
8 transportation to doctor's appointments and with maintaining his home.

9 4. Mr. Boswell has remained in compliance with all conditions of pretrial  
10 supervision and respectfully requests permission to travel within the Continental U.S. for work  
11 purposes and to visit with his father.

12 5. Pretrial Services Officers, Zack Bowen and Camron Pitcher from the Central  
13 of California's Pretrial Services Office, have no opposition to the request.

14 6. The government also has no opposition to this request.

15 7. Mr. Boswell therefore respectfully request that the pretrial supervision  
16 conditions be modified to permit his travel within the Continental U.S. for work related purposes and  
17 to visit his father.

18  
19 DATED this 30<sup>th</sup> day of January, 2014.

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21 RENE L. VALLADARES  
Federal Public Defender

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23 By: /s/ Nisha Brooks-Whittington  
NISHA BROOKS-WHITTINGTON,  
24 Assistant Federal Public Defender  
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAMON BOSWELL,

Defendant.

Case No.: 2:13-cr-183-JAD-CWH

~~PROPOSED ORDER TO MODIFY~~  
PRETRIAL CONDITIONS

ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the pretrial release conditions of the defendant be modified to permit travel within the Continental U.S. for work related purposes and to visit his father.

DATED 30th day of January, 2014.

  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that I am an employee of the Law offices of the Federal Public Defender for the District of Nevada and am a person of such age and discretion as to be competent to serve papers.

That on January 30, 2014, I served an electronic copy of the above and foregoing **UNOPPOSED MOTION AND PROPOSED ORDER TO MODIFY THE CONDITIONS OF PRETRIAL RELEASE** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
CRISTINA BROWN  
Assistant United States Attorneys  
333 Las Vegas Blvd. So., 5<sup>th</sup> Floor  
Las Vegas, Nevada 89101

/S/ Nancy Vasquez  
Nancy Vasquez, Legal Secretary to  
NISHA BROOKS-WHITTINGTON,  
Assistant Federal Public Defender